

DEMBO, BROWN & BURNS LLP

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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

SANDRA J. MAY,

Debtor.

CHAPTER 13

Case No.: 19-27812-JNP

Hearing Date: July 1, 2020

The Honorable Jerrold N. Poslusny, U.S.B.J.

**OBJECTION OF McCORMICK 106, LLC TO CONFIRMATION
OF DEBTORS' MODIFIED CHAPTER 13 PLAN**

Secured Creditor, McCormick 106, LLC ("McCormick"), by and through its undersigned counsel, hereby submits the following Objections to the Confirmation of Debtor's Third Modified Chapter 13 Plan [Doc 61]:

FACTUAL BACKGROUND

1. On or about May 24, 2018, McCormick obtained judgment against the Debtor in the total amount of \$59,973.31 for her intentional and willful acts of conversion and property damage (hereinafter, the "Judgment"). See Claim 6 at p. 5-7.
2. On or about May 29, 2018, the Judgment was docketed as a statewide lien in the State of New Jersey and assigned judgment number J-086859-18. See Claim 6 at p. 4.
3. As of the Petition Date, there remained the sum of \$52,181.19 due and owing from the Debtor to McCormick under the Judgment.

4. The Debtor's Schedule A [Doc 16 at p. 4] values the property located at 590 Livezey Street, Philadelphia, Pennsylvania (the "Rental Property") in the amount of \$219,500.00.

5. The Debtor's Schedule D [Doc 16 at p. 12-14] lists claims totaling \$230,715.12, which encumber the Rental Property.

6. The Debtor's Schedule A [Doc 16 at p. 3] further values the property located at 9 Brandywine Court, Egg Harbor Township, New Jersey (the "Residence") in the amount of \$149,500.00.

7. The Debtor's Schedule D [Doc 16 at p. 12-14] lists claims totaling \$110,970.00, which encumber the Debtor's Residence.

8. The Debtor has claimed exemptions in the Residence totaling \$24,925.00. See Doc 16 at p. 10.

9. The Debtor stated in her Schedule J, that she has disposable income in the amount of \$681.00 per month [Doc 16 at p. 31].

10. The Debtor's First Modified Plan [Doc 19] provided for monthly plan payments in the amount of \$680.00 for a total plan disbursement in the amount of \$40,800.00. Said Plan was also silent as to the Judgment and further provided for no distribution to unsecured creditors.

11. On October 19, 2019, McCormick obtained a Comparative Market Analysis of the Rental Property, which demonstrates a value of \$270,000.00. A true and correct copy of said valuation is attached hereto as Exhibit A.

12. In addition, also on October 19, 2019, McCormick obtained a Broker's Price Opinion of the Residence, which demonstrates a value of \$173,500.00. A true and correct copy of said valuation is attached hereto as Exhibit B.

13. On or about October 18, 2019, McCormick filed an Adversary Complaint to declare the Judgment to be non-dischargeable [Doc 26].

14. On or about October 23, 2019, McCormick filed its Objection to the Confirmation of the Debtor's First Modified Plan [Doc 28], which addressed many of the same issues outlined herein and which the Debtor has failed to address and/or overcome. This includes the Debtor's undervaluation of her assets, her inability to pay McCormick's secured claim and her failure to propose a plan that pays unsecured creditors the liquidation value of the estate.

15. On or about December 4, 2019, the Judgment was declared nondischargeable. See Doc 7 under Adv.Pro.No.19-2189-JNP.

16. On or about December 17, 2019, the Debtor filed a Modified Plan [Doc 37], which, despite McCormick's previously filed Objection, was again completely silent as to the Judgment, McCormick's secured position in the Debtor's residence and/or the other issues raised in McCormick's Objection.

17. On or about March 9, 2020, this Court denied the Debtor's motion to vacate the Order determining the nondischargeability of McCormick's Judgment. See Doc 12 under Adv.Pro.No. 19-2189-JNP.

18. On or about March 4, 2020, the parties appeared in Court for the scheduled confirmation hearing. At that time the Debtor still had not addressed the objections of McCormick. At that time, McCormick agreed to adjourn the confirmation hearing to May 6, 2020 on the basis that said hearing would be peremptory and Debtor would amend her schedules and modify the plan to address the issues raised by the Chapter 13 Trustee and McCormick.

19. Despite having been given an additional two (2) months to file her amended schedules and modified plan, the day before the confirmation hearing, on or about May 5, 2020,

the Debtor filed Amended Schedules I and J [Doc 54], wherein she indicated that she has \$706.00 in disposable income, an increase from the \$681.00 previously reported.

20. In addition, also on or about May 5, 2020, the Debtor filed a Second Modified Plan [Doc 55], which, despite McCormick's previously filed Objection, was again completely silent as to the Judgment, McCormick's secured position in the Debtor's residence, and the other issues raised in McCormick's Objection (valuation and the §1325(a)(4) requirement).

21. On or about May 6, 2020, the Court conducted the "peremptory" confirmation hearing via telephone. Despite having had approximately seven (7) months to address McCormick's Objections and despite having been given a two (2) month adjournment to specifically address the Objections, the Debtor was still unprepared to address McCormick's objection, the nondischargeable judgment, McCormick's secured claim, the valuation issues and/or the §1325(a)(4) requirement.

22. In spite of the Debtor's complete lack of diligence and the continued prejudice to McCormick (from whom the Debtor stole) the Debtor was afforded another two (2) weeks to file yet another modified plan and confirmation was adjourned to July 1, 2020.

23. On or about May 18, 2020, the Debtor filed her Third Modified Plan [Doc 61] (the "Current Plan").

24. The Current Plan provides for payments of \$680.00 per month for sixty (60) months [Id.] totaling \$40,800.00.

25. The Current Plan proposes to pay counsel fees of \$4,065.00, IRS claim of \$16,937.00, arrears to Utility Employees FCU in the amount of \$9,783.00. Id.

26. The Current Plan also proposes a zero percent (0%) distribution to unsecured creditors. Id.

27. The Current Plan also proposes a cram down of McCormick's Judgment by avoiding the sum of \$14,921.32, which is based upon the Debtor's valuation of the Residence in the amount of \$149,500.00. Id. It bears noting, in the spirit of intellectual honesty that, based upon the Debtor's numbers, the \$14,921.32 is actually the proposed amount to be retained as a lien and the proposed cram down amount is actually \$37,259.86.

28. In addition, the Debtor indicates in Section 9 of the Current Plan that the plan was modified, in part, to "pay non-exempt equity to McCormick 106, LLC." Id.

29. Thereafter, on or about June 4, 2020, the Debtor again amended her Schedules I and J [Doc 66].

30. As set forth therein, the Debtor now claims she has \$731.00 in monthly disposable income. Id. at p. 4.

LEGAL ARGUMENT

31. The Lender objects to confirmation of the Debtor's Current Plan on multiple grounds.

32. First, McCormick objects to the Debtor's Current Plan as it simply not feasible.

33. Based upon the Debtor's valuation, there is no dispute that McCormick's Judgment is admittedly secured up to the amount of \$14,921.32.

34. However, based upon the Debtor's disposable income and the obligations set forth in the Current Plan, the Debtor does not have the ability to pay McCormick's secured claim through the Plan.

35. To that end, the Debtor's Schedule J [Doc 66] states that the Debtor has \$731.00 per month in disposable income (as opposed to the lesser \$680.00 per month she proposes to pay through the Current Plan), which over sixty (60) months would total \$43,860.00.

36. Presuming a ten percent (10%) Trustee's commission (\$4,386.00) and thereafter reducing the remaining disposable income (\$39,474.00) by the counsel fees of \$4,065.00, IRS claim of \$16,937.00, arrears to Utility Employees FCU in the amount of \$9,783.00, there remains the sum of \$8,689.00 to pay towards McCormick's secured claim (by Debtor's calculation \$14,921.32).

37. Therefore, even using the Debtor's lower valuation, the Debtor's Current Plan is not feasible as the Debtor is required to pay McCormick \$14,921.32 but only has the sum of \$8,689.00 for that purpose.¹

38. Additionally, the Debtor provides no support for her valuation of the Residence, which is likely because she has woefully undervalued same at \$149,500.00.

39. To that end, based upon McCormick's valuation (\$173,500.00), www.zillow.com (\$187,970.00) [See Exhibit C hereto], and www.realtor.com (\$172,200.00) [See Exhibit D hereto], there is far more equity in the Residence than the Debtor is willing to admit.

40. However, again, even assuming for purposes of this argument, that the Debtor's valuation is correct, she still lacks the financial ability to make the required payments.

41. Accordingly, the Debtor's Current Plan violates 11 U.S.C. §1325(a)(6), which requires that "the debtor will be able to make all payments under the plan and to comply with the plan." Accordingly, the Debtor's Current Plan cannot be confirmed as it is not feasible.

42. In addition, the Debtor's Current Plan violates 11 U.S.C. §1325(a)(4). Pursuant to §1352(a)(4), the Debtor is required to pay to unsecured claimants the amount that would be paid through a Chapter 7 liquidation.

¹ It bears noting that based upon the Current Plan, which proposes a \$680.00 per month payment, the amount paid to McCormick would be \$5,935.00, which is also less than the \$14,921.32 required.

43. Here, even assuming a ten percent (10%) cost of sale for the Rental Property, there would remain distributable equity in the amount of \$13,343.47 to unsecured creditors from the sale of the Rental Property, as follows:

Property Value	\$270,000.00
Costs of sale	\$ 27,000.00
1 st Mortgage	\$113,462.65
2 nd Mortgage	\$ 19,252.47
3 rd Mortgage	<u>\$ 96,941.41</u>
Total Equity	\$ 13,343.47

44. Despite the equity in the Rental Property² (as well as undervalued personal property) the Debtor proposes no distribution to unsecured creditors in violation of §1325(a)(4). As such the Debtor's Current Plan is unconfirmable.

45. In this regard, the Plan not only violates §1325(a)(4), but in the event that the Debtor must pay the equity to unsecured creditors, the Debtor (as described above) does not have sufficient disposable income available to make those payments (in fact, she does not have sufficient disposable income to support the Current Plan, as demonstrated above). As such, the Debtor cannot confirm a plan of reorganization as she does not have sufficient disposable income to fund same.

46. Accordingly, the Court must deny confirmation of the Debtor's Current Plan, as the Current Plan is not feasible, as it violates prevailing bankruptcy law, and as the Debtor does not have the disposable income necessary to propose a confirmable plan of reorganization.

² The Debtor has also undervalued personal property, a basic google search for used Smith and Wesson 357 handguns shows that such firearms sell between \$700.00 and \$950.00, as opposed to the \$200.00 valuation in Debtor's Schedule A [Doc 16 at p. 5]. See Exhibit E attached hereto. The Debtor's attempt to undervalue her assets undermines the veracity of her Petition and Schedules, which she signed under the penalty of perjury.

WHEREFORE, McCormick 106, LLC respectfully request that confirmation of Debtor's Third Modified Chapter 13 Plan of Reorganization be denied.

Respectfully submitted,
DEMBO, BROWN & BURNS LLP
Attorneys for McCormick 106, LLC

By: /s/Kyle F. Eingorn
Kyle F. Eingorn, Esquire

Dated: June 17, 2020

EXHIBIT “A”

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

This analysis has not been performed in accordance with Uniform Standards of Professional Appraisal Practice which require valuers to act as unbiased, disinterested third parties with impartiality, objectivity, and independence and without accommodation of personal interest. It is not to be construed as an appraisal and may not be used as such for any purpose. This CMA provides a probable sales price to assist the user in decisions that may result in a disposition of the property. The user understands that this CMA may be provided in anticipation of a listing, and agrees to consider engaging the real estate professional if the property is listed for sale. This CMA may not be used for a loan origination.

Address 590 Livezey St, Philadelphia, PA 19128
Inspection Date 10/19/2019
Loan Number 1405059585
Borrower Name MAY, SANDRA

Order ID 6378575 **Property ID** 27424732
Date of Report 10/20/2019
APN 213345816
County Philadelphia

Tracking IDs

Order Tracking ID 590 Livezey St
Tracking ID 2 --

Tracking ID 1 590 Livezey St
Tracking ID 3 --

General Conditions

Owner MAY, SANDRA
R. E. Taxes \$3,229
Assessed Value \$230,700
Zoning Classification RSA3
Property Type Multifamily
Occupancy Occupied
Ownership Type Fee Simple
Property Condition Average
Estimated Exterior Repair Cost \$0
Estimated Interior Repair Cost \$0
Total Estimated Repair \$0
HOA No
Visible From Street Visible
Road Type Public

Condition Comments

The subject conforms to the neighborhood in style, age and condition. Home and landscaping seem to have been maintained on an average basis; no deferred maintenance or adverse conditions noted

Neighborhood & Market Data

Location Type Urban
Local Economy Stable
Sales Prices in this Neighborhood Low: \$171,666
High: \$465,000
Market for this type of property Remained Stable for the past 6 months.
Normal Marketing Days <90

Neighborhood Comments

Subject is located in an established suburban neighborhood. The area is a mix of home styles with limited commercial uses in residential neighborhoods. Area homes often vary in size, style and age but are typically in average or better condition and maintained. The area market is stable with slow appreciation

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Current Listings

	Subject	Listing 1	Listing 2	Listing 3 *
Street Address	590 Livezey St	245 Roxborough Ave	166 W Salaignac St	231 Parker Ave
City, State	Philadelphia, PA	Philadelphia, PA	Philadelphia, PA	Philadelphia, PA
Zip Code	19128	19128	19128	19128
Datasource	Tax Records	MLS	MLS	MLS
Miles to Subj.	--	1.27 ¹	1.78 ¹	0.67 ¹
Property Type	Multifamily	Multifamily	Multifamily	Multifamily
Original List Price \$	\$	\$299,000	\$320,000	\$299,900
List Price \$	--	\$265,000	\$320,000	\$299,900
Original List Date		09/16/2019	10/15/2019	09/05/2019
DOM - Cumulative DOM	-- --	34 - 34	5 - 5	15 - 45
Age (# of years)	54	119	119	28
Condition	Average	Average	Average	Average
Sales Type	--	Fair Market Value	Fair Market Value	Fair Market Value
Location	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential
View	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential
Style/Design	2 Stories Duplex	2 Stories Duplex	2 Stories Duplex	2 Stories Duplex
# Units	2	2	2	2
Living Sq. Feet	1,610	1,504	1,899	1,680
Bdrm - Bths - ½ Bths	4 - 2	3 - 2	4 - 2	4 - 2
Total Room #	10	7	8	8
Garage (Style/Stalls)	None	None	None	Attached 2 Car(s)
Basement (Yes/No)	Yes	Yes	Yes	Yes
Basement (% Fin)	0%	0%	0%	0%
Basement Sq. Ft.	805	752	950	840
Pool/Spa	--	--	--	--
Lot Size	0.06 acres	0.05 acres	0.03 acres	0.1 acres
Other	None	None	None	None

* Listing 3 is the most comparable listing to the subject.

¹ Comp's "Miles to Subject" was calculated by the system.

² Comp's "Miles to Subject" provided by Real Estate Professional.

³ Subject \$/ft based upon as-is sale price.

Listing Comments Why the comparable listing is superior or inferior to the subject.

Listing 1 Similar to the subject in age, GLA, location, size and style. Central A/C, Cooling Fuel: Electric, Heating: Hot Water, Heating Fuel: Natural Gas, Hot Water: Natural Gas, Water Source: Public, Sewer: Public Sewer Inferior bedroom count

Listing 2 First floor one bedroom, living room, eat in kitchen, full basement, fenced yard. 2nd and 3rd floor bi level. Two bedroom, eat in kitchen with granite, cinnamon maple cabinets and stainless steel appliances, hardwood floors. Inferior bedroom count

Listing 3 each unit offers a spacious living room, dining area and working kitchen with gas cooking, dishwasher, and abundance of cabinet space, a HVAC utility closet, hall bath, linen closet and 2 spacious bedrooms with ample closets. Superior garage count

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Recent Sales

	Subject	Sold 1	Sold 2	Sold 3 *
Street Address	590 Livezey St	174 Grape St	454 Leverington Ave	5481 Quentin St
City, State	Philadelphia, PA	Philadelphia, PA	Philadelphia, PA	Philadelphia, PA
Zip Code	19128	19127	19128	19128
Datasource	Tax Records	MLS	MLS	MLS
Miles to Subj.	--	1.24 ¹	0.71 ¹	1.79 ¹
Property Type	Multifamily	Multifamily	Multifamily	Multifamily
Original List Price \$	--	\$299,000	\$285,000	\$289,900
List Price \$	--	\$299,000	\$285,000	\$289,900
Sale Price \$	--	\$262,000	\$275,000	\$300,000
Type of Financing	--	Conventional	Conventional	Conventional
Date of Sale	--	10/16/2019	06/21/2019	08/22/2019
DOM - Cumulative DOM	-- --	38 - 128	21 - 59	9 - 39
Age (# of years)	54	119	94	49
Condition	Average	Average	Average	Average
Sales Type	--	Fair Market Value	Fair Market Value	Fair Market Value
Location	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential
View	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential
Style/Design	2 Stories Duplex	2 Stories Duplex	2 Stories Duplex	2 Stories Duplex
# Units	2	2	2	2
Living Sq. Feet	1,610	2,944	1,872	1,680
Bdrm - Bths - ½ Bths	4 - 2	6 - 3	2 - 2	4 - 2
Total Room #	10	12	7	7
Garage (Style/Stalls)	None	None	None	Attached 2 Car(s)
Basement (Yes/No)	Yes	Yes	Yes	Yes
Basement (% Fin)	0%	0%	0%	0%
Basement Sq. Ft.	805	1,472	936	840
Pool/Spa	--	--	--	--
Lot Size	0.06 acres	0.03 acres	0.05 acres	0.05 acres
Other	None	None	None	None
Net Adjustment	--	-\$20,340	-\$5,500	-\$2,500
Adjusted Price	--	\$241,660	\$269,500	\$297,500

* Sold 3 is the most comparable sale to the subject.

¹ Comp's "Miles to Subject" was calculated by the system.

² Comp's "Miles to Subject" provided by Real Estate Professional

³ Subject \$/ft based upon as-is sale price.

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Recent Sales - Cont.

Reasons for Adjustments Why the comparable sale is superior or inferior to the subject.

- Sold 1** One 4 bedroom, 2 Full Bathroom Unit and One (2) Bedroom Unit. Walking distance to Manayunk Main Street, Septa Bus Service and R6 Train Station. Adjusted for: bedrooms(-4000), bath(-3000), GLA(-13340)
- Sold 2** The first floor unit boasts a spacious bedroom, living room, galley kitchen with dishwasher, full bathroom with a tub and a bonus room which can be used as an office. This unit is complete with a basement with a laundry area. The second floor unit is a desirable 1-bedroom apartment with an eat-in kitchen with 42" cabinets and granite countertops, a full bathroom, bedroom and a spacious living room. Adjusted for: bedrooms(-4000), concessions(-1500)
- Sold 3** Duplex! 2 plus 2. Great investment opportunity. Located in desirable Roxborough on a beautiful tree lined street. Low maintenance. Desirable rental area. Hardwood floors throughout. Separate Utilities. Laundry Center in basement. Each tenant has a garage and a private parking space. Both units consist of a large great room, modern kitchen, 2 Beds and a bath. Adjusted for: garage(-2500)

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Subject Sales & Listing History

Current Listing Status	Not Currently Listed	Listing History Comments
Listing Agency/Firm		None
Listing Agent Name		
Listing Agent Phone		
# of Removed Listings in Previous 12 Months	0	
# of Sales in Previous 12 Months	0	

Original List Date	Original List Price	Final List Date	Final List Price	Result	Result Date	Result Price	Source
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Marketing Strategy

	As Is Price	Repaired Price
Suggested List Price	\$279,900	\$279,900
Sales Price	\$270,000	\$270,000
30 Day Price	\$260,000	--

Comments Regarding Pricing Strategy

No deferred maintenance noted upon exterior inspection and property should be marketed in as- is condition. All comparables selected offer good overall similarities to the subject and are representative of both the subjects neighborhood and nearby competing neighborhoods of similar age, size and style homes offering similar buyer appeal. Subjects final value is based on both the active and sold comparables as this is a stable market. Subjects final value represents a value with normal marketing times and based on the most similar and proximate comps in this report. Search was expanded out to 2 miles, however, all comps are in the same subdivision(Manayunk/Roxborough), as the subject. Subject compares best with comps S3 and L3, but all comps were considered for valuation purposes.

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by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Clear Capital Quality Assurance Comments Addendum

Reviewer's Notes The broker's as-is conclusion reflects the market for the subject. Comps are within a reasonable distance, relatively current, and accurately reflect the subject's defining characteristics. Thus, the as-is conclusion appears to be adequately supported.

DRIVE-BY CMA

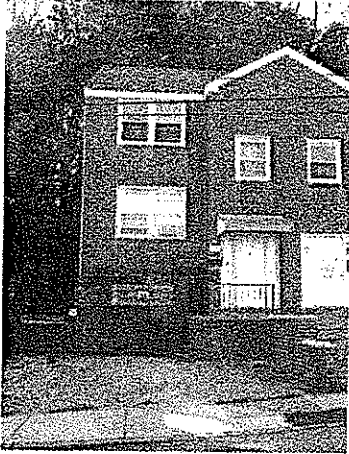
by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

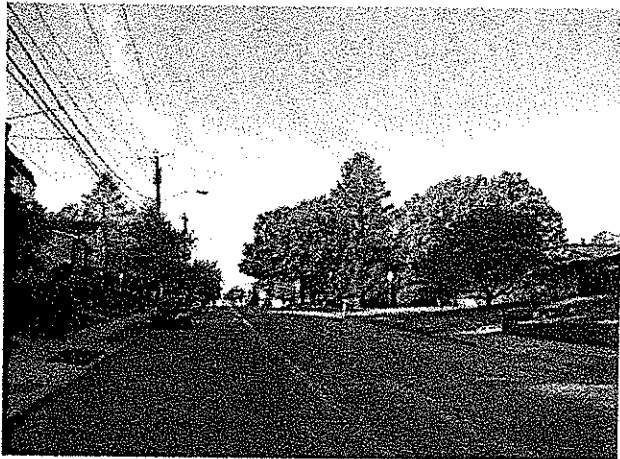
Subject Photos



Front



Address Verification



Street

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by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Listing Photos

245 ROXBOROUGH AVE
Philadelphia, PA 19128



Front

166 W SALAIGNAC ST
Philadelphia, PA 19128



Front

231 PARKER AVE
Philadelphia, PA 19128



Front

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Sales Photos

 174 GRAPE ST
Philadelphia, PA 19127




Front

 454 LEVERINGTON AVE
Philadelphia, PA 19128



Front

 5481 QUENTIN ST
Philadelphia, PA 19128



Front

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590 Livezey St
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ClearMaps Addendum

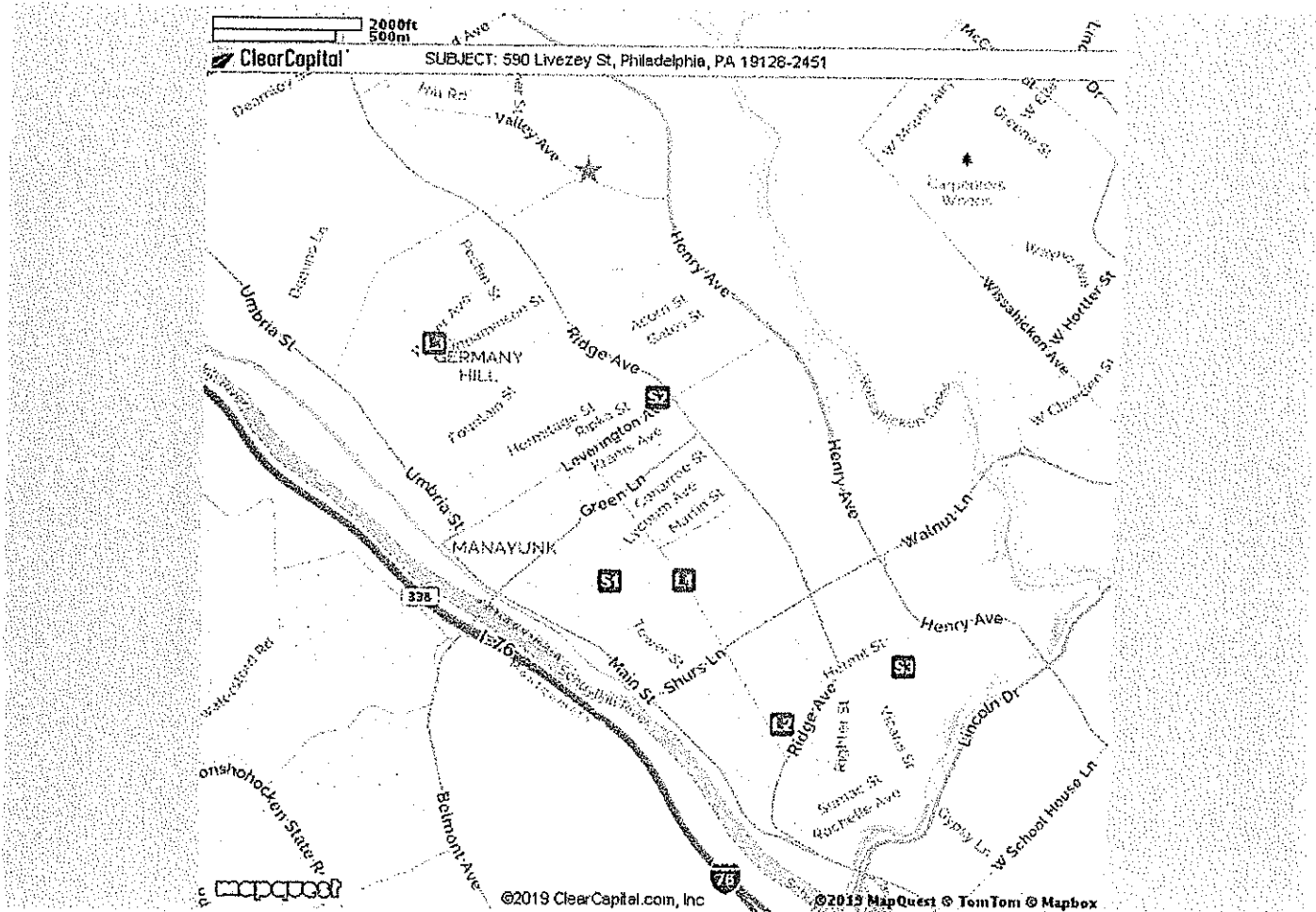
Address ☆ 590 Livezey St, Philadelphia, PA 19128

Loan Number 1405059585

Suggested List \$279,900

Suggested Repaired \$279,900

Sale \$270,000



Comparable	Address	Miles to Subject	Mapping Accuracy
☆ Subject	590 Livezey St, Philadelphia, PA	—	Parcel Match
4 Listing 1	245 Roxborough Ave, Philadelphia, PA	1.27 Miles ¹	Parcel Match
2 Listing 2	166 W Salignac St, Philadelphia, PA	1.78 Miles ¹	Parcel Match
3 Listing 3	231 Parker Ave, Philadelphia, PA	0.67 Miles ¹	Parcel Match
1 Sold 1	174 Grape St, Philadelphia, PA	1.24 Miles ¹	Parcel Match
2 Sold 2	454 Leverington Ave, Philadelphia, PA	0.71 Miles ¹	Parcel Match
3 Sold 3	5481 Quentin St, Philadelphia, PA	1.79 Miles ¹	Parcel Match

¹ The Comparable "Distance from Subject" value has been calculated by the Clear Capital system.

² The Comparable "Distance from Subject" value has been provided by the Real Estate Professional.

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Satellite Map Addendum

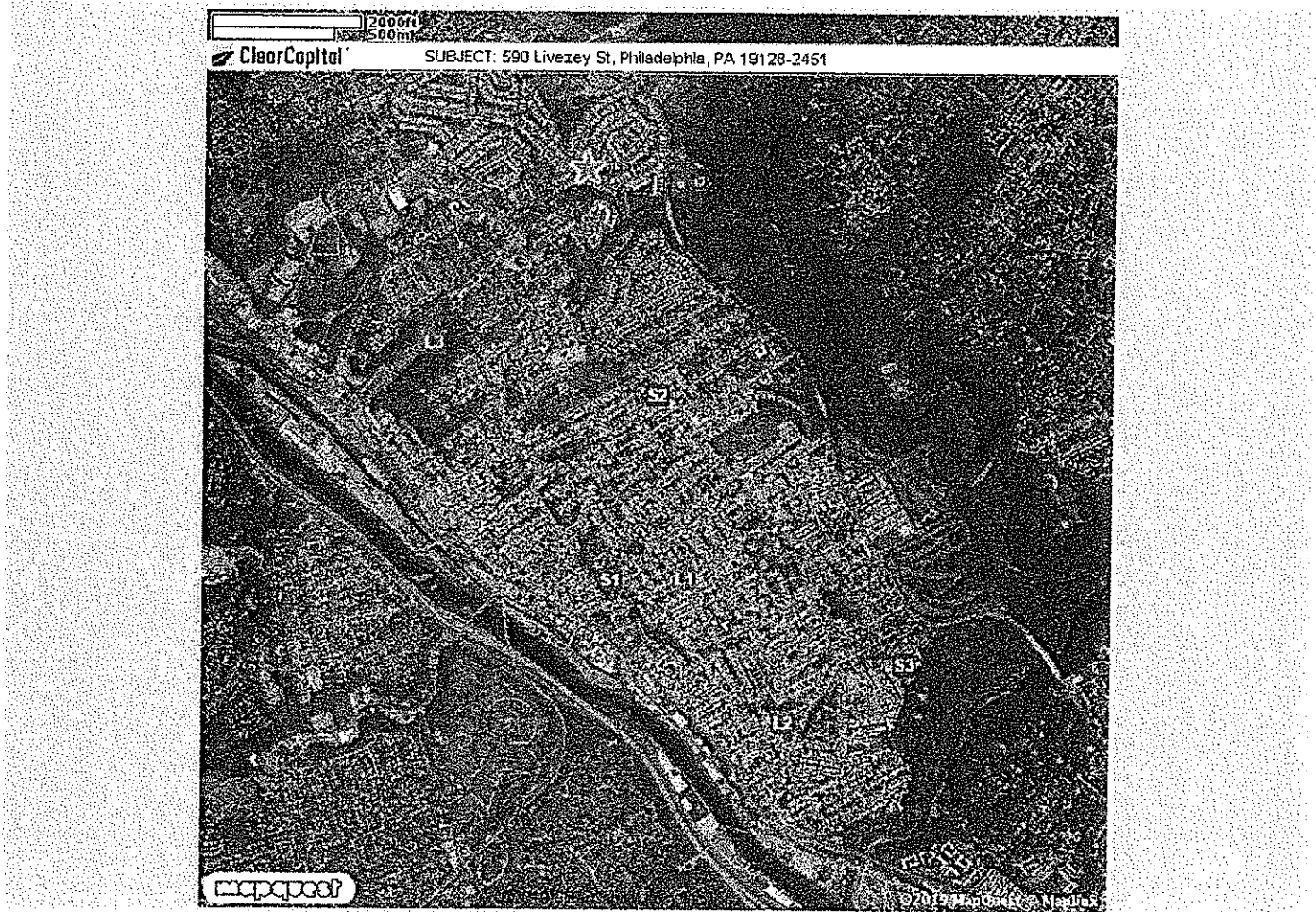
Address ☆ 590 Livezey St, Philadelphia, PA 19128

Loan Number 1405059585

Suggested List \$279,900

Suggested Repaired \$279,900

Sale \$270,000



Comparable	Address	Miles to Subject	Mapping Accuracy
☆ Subject	590 Livezey St, Philadelphia, PA	--	
1 Listing 1	245 Roxborough Ave, Philadelphia, PA	1.27 Miles ¹	Parcel Match
2 Listing 2	166 W Salignac St, Philadelphia, PA	1.78 Miles ¹	Parcel Match
3 Listing 3	231 Parker Ave, Philadelphia, PA	0.67 Miles ¹	Parcel Match
1 Sold 1	174 Grape St, Philadelphia, PA	1.24 Miles ¹	Parcel Match
2 Sold 2	454 Leverington Ave, Philadelphia, PA	0.71 Miles ¹	Parcel Match
3 Sold 3	5481 Quentin St, Philadelphia, PA	1.79 Miles ¹	Parcel Match

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DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Addendum: Report Purpose

Market Approach and Market Time

The Market Approach of this report, as established by the customer, is: **Fair Market Price**. (See definition below.)
The Marketing Time as specified by the customer is **Typical**. (See definition below.)

Definitions:

Fair Market Price	A price at which the property would sell between a willing buyer and a willing seller neither being compelled by undue pressure and both having reasonable knowledge of relevant facts.
Distressed Price	A price at which the property would sell between a willing buyer and a seller acting under duress.
Marketing Time	The amount of time the property is exposed to a pool of prospective buyers before going into contract. The customer either specifies the number of days, requests a marketing time that is typical to the subject's market area and/or requests an abbreviated marketing time.
Typical for Local Market	The estimated time required to adequately expose the subject property to the market resulting in a contract of sale.

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Addendum: Report Purpose - cont.

Report Instructions

This section shows the instructions that were approved by the customer and provided to the broker prior to completing the report.
*** Customer Supplied Subject Information: TENANT OCCUPIED- DO NOT MAKE CONTACT ***

Instructions last updated: 7/17/2017

If this property is found to be vacant land, please STOP WORKING immediately and call Clear Capital at 530-582-5011

Please include the APN and Tax ID in the body of the report.

Purpose:

Please determine a market price for this property at which it would sell in a typical marketing time for the area.

Customer Specific:

Please provide the HOA and tax information in the body of the report.

- HOA address, Name, and any dues that are required.
- Tax assessed values, required tax amounts

Customer Special Request:

1. Please try to accurately determine occupancy to the best of your ability from a drive-by inspection.
2. Please provide detailed comments for each comparable stating how it is inferior or superior to the subject.

Comparable Requirements:

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3. Use the subject characteristics provided in the report Grid (if preloaded) to evaluate the property. This information is from a full interior appraisal and is assumed to be most accurate. If your inspection reveals obvious inaccuracies, please explain in the narrative of the report.
4. Include sufficient detail to help our mutual customer gain a complete understanding of the subject's neighborhood such as neighborhood desirability, amenities, parks, schools, commercial or industrial influences, REO activity, traffic, board-up-homes, etc.
5. Do not approach occupants or owners.
6. If the subject is a Commercial property, contact Clear Capital immediately at 530-582-5011 for direction on how to proceed with the report.
7. Please do not accept if you or your office has completed a report on this property

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Report Instructions - cont.

in the last months, are currently listing this property, or have any vested interest in the subject property.

8. Clear Capital does not allow any log ins from IP addresses from foreign countries. This includes, but is not limited to; data entry services, form completion services, etc. Also, it is against Clear Capital code of conduct to share your password with anyone who is not a W2 employee in your office.

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3. One ADDRESS VERIFICATION photo
4. One STREET SCENE photo looking down the street
5. Labeled MLS Sold & Listing Comp photos required; please comment if no MLS.

DRIVE-BY CMA

by ClearCapital

590 Livezey St
Philadelphia, PA 19128-2451

1405059585
Loan Number

\$270,000
As-Is Value

Broker Information

Broker Name	Leeann Smoyer-Levin	Company/Brokerage	American Destiny Real Estate - Philadelphia, Inc.
License No	RS311469	Address	2424 E York St Philadelphia PA 19125
License Expiration	05/31/2020	License State	PA
Phone	2154314658	Email	gandlagent@gmail.com
Broker Distance to Subject	6.99 miles	Date Signed	10/20/2019

By confirming the above contact and real estate license information and submitting the report, the above signed hereby certifies and agrees that: 1) I personally took the pictures, selected comparables, and determined the price conclusion. 2) To the best of my knowledge, the statements of fact contained in this report are true and correct. 3) The reported analyses, opinions, and conclusions are my personal, impartial, and unbiased professional analyses, opinions, and conclusions. 4) I have no present or prospective interest in the property that is the subject of this report and no personal interest with respect to the parties involved. 5) I have no bias with respect to the property that is the subject of this report or to the parties involved with this assignment. 6) My compensation for completing this assignment is not contingent upon the development or reporting of a predetermined price point. 7) I did not base, either partially or completely, my analysis and/or opinion and conclusions in this report on race, color, religion, sex, age, marital status, handicap, familial status, or national origin of either the prospective owners or occupants of the subject property or of the present owners or occupants of the properties in the vicinity of the subject property or on any other basis prohibited by law. 8) I maintain errors and omissions insurance, to the extent required by state law, for all liability associated with the preparation of this Report.

Disclaimer

This analysis has not been performed in accordance with the Uniform Standards of Professional Appraisal Practice which requires valuers to act as unbiased, disinterested third parties with impartiality, objectivity and independence and without accommodation of personal interest. It is not to be construed as an appraisal and may not be used as such for any purpose.

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EXHIBIT “B”

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct **N/A** **\$173,500**
 Egg Harbor Township, NJ 08234 Loan Number As-Is Value

Please Note: This report was completed with the following assumptions: Market Approach: **Fair Market Price**, Marketing Time: **Typical**. Important additional information relating to this report, including use and restrictions, is contained in an attached addendum which is an integral part of this report.

Address	9 Brandywine Court, Egg Harbor Township, NJ 08234	Order ID	6378421	Property ID	27424888
Inspection Date	10/19/2019	Date of Report	10/19/2019		
Loan Number	N/A	APN	08-01612-0000-00006		
Borrower Name	May, Sandra	County	Atlantic		

Tracking IDs

Order Tracking ID	Sandra May- Residence	Tracking ID 1	Sandra May- Residence
Tracking ID 2	--	Tracking ID 3	--

General Conditions

Owner	May Sandra	Condition Comments
R. E. Taxes	\$5,446	The subject appears to be in average condition with no visible damages to note. the home conforms to the other homes in the area.
Assessed Value	\$169,600	
Zoning Classification	RG2	
Property Type	townhouse	
Occupancy	Occupied	
Ownership Type	Fee Simple	
Property Condition	Average	
Estimated Exterior Repair Cost	\$0	
Estimated Interior Repair Cost	\$0	
Total Estimated Repair	\$0	
HOA	The Clusters	
Association Fees	\$35 / Month (Landscaping, Greenbelt)	
Visible From Street	Visible	
Road Type	Public	

Neighborhood & Market Data

Location Type	Suburban	Neighborhood Comments
Local Economy	Stable	The subject is located in The Clusters, a neighborhood of townhome and condo style homes. Currently, there are no active or sold listings in the last 12 months. Therefore, within a two mile radius, 9 are active; one short sale and one REO. In the last 12 months, within this same proximity, 33 of these style homes have sold; two short sales and 9 REO's.
Sales Prices in this Neighborhood	Low: \$39,700 High: \$198,000	
Market for this type of property	Remained Stable for the past 6 months.	
Normal Marketing Days	<90	

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct

Egg Harbor Township, NJ 08234

N/A

Loan Number

\$173,500

As-Is Value

Current Listings

	Subject	Listing 1 *	Listing 2	Listing 3
Street Address	9 Brandywine Court	34 Jamestown Circle	143 Dunlin Lane	215 Tyrens Drive
City, State	Egg Harbor Township, NJ	Mays Landing, NJ	Pleasantville, NJ	Mays Landing, NJ
Zip Code	08234	08330	08232	08330
Datasource	Tax Records	MLS	MLS	MLS
Miles to Subj.	--	1.16 ¹	7.36 ¹	1.21 ¹
Property Type	Other	Other	Other	Other
Original List Price \$	\$	\$179,900	\$179,000	\$199,900
List Price \$	--	\$174,900	\$179,000	\$199,900
Original List Date		04/19/2019	09/26/2019	09/05/2019
DOM - Cumulative DOM	-- - --	25 - 183	23 - 23	26 - 44
Age (# of years)	18	16	7	16
Condition	Average	Average	Average	Average
Sales Type	--	Fair Market Value	Fair Market Value	Fair Market Value
Location	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential
View	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential
Style/Design	2 Stories townhome	2 Stories townhome	2 Stories townhome	2 Stories townhome
# Units	1	1	1	1
Living Sq. Feet	1,464	1,240	1,888	1,789
Bdrm - Bths - ½ Bths	3 - 2 - 1	3 - 2 - 1	3 - 2 - 2	3 - 2 - 1
Total Room #	6	9	9	8
Garage (Style/Stalls)	Attached 1 Car	None	Attached 1 Car	Attached 1 Car
Basement (Yes/No)	No	No	No	No
Basement (% Fin)	0%	0%	0%	0%
Basement Sq. Ft.	--	--	--	--
Pool/Spa	--	--	--	--
Lot Size	.08 acres	01 acres	.05 acres	.04 acres
Other	--	--	--	--

* Listing 1 is the most comparable listing to the subject.

¹ Comp's "Miles to Subject" was calculated by the system.

² Comp's "Miles to Subject" provided by Real Estate Professional.

³ Subject \$/ft based upon as-is sale price.

Listing Comments Why the comparable listing is superior or inferior to the subject.

Listing 1 used for GLA and style. This home is inferior in GLA and does not have a garage.

Listing 2 used for style and GLA. this home is superior in GLA.

Listing 3 used for age, style and GLA. this home is superior in GLA.

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct

Egg Harbor Township, NJ 08234

N/A

Loan Number

\$173,500

As-Is Value

Recent Sales

	Subject	Sold 1 *	Sold 2	Sold 3
Street Address	9 Brandywine Court	183 Tyrens	147 Tyrens Drive	4 Meadow Circle
City, State	Egg Harbor Township, NJ	Mays Landing, NJ	Mays Landing, NJ	Mays Landing, NJ
Zip Code	08234	08330	08330	08330
Datasource	Tax Records	MLS	MLS	MLS
Miles to Subj.	--	1.22 ¹	1.18 ¹	1.66 ¹
Property Type	Other	Other	Other	Other
Original List Price \$	--	\$190,000	\$197,500	\$194,900
List Price \$	--	\$190,000	\$197,500	\$194,900
Sale Price \$	--	\$180,000	\$197,500	\$198,000
Type of Financing	--	Va	Conventional	Fha
Date of Sale	--	11/01/2018	05/15/2019	04/26/2019
DOM - Cumulative DOM	-- --	25 - 73	145 - 185	1 - 57
Age (# of years)	18	15	15	12
Condition	Average	Good	Average	Average
Sales Type	--	Fair Market Value	Fair Market Value	Fair Market Value
Location	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential
View	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential	Neutral ; Residential
Style/Design	2 Stories townhome	2 Stories townhome	2 Stories townhome	2 Stories townhome
# Units	1	1	1	1
Living Sq. Feet	1,464	1,632	1,893	1,705
Bdrm - Bths - ½ Bths	3 - 2 - 1	3 - 2 - 1	3 - 3 - 1	3 - 2 - 1
Total Room #	6	8	8	8
Garage (Style/Status)	Attached 1 Car	Attached 1 Car	Attached 1 Car	Attached 1 Car
Basement (Yes/No)	No	No	No	No
Basement (% Fin)	0%	0%	0%	0%
Basement Sq. Ft.	--	--	--	--
Pool/Spa	--	--	--	--
Lot Size	.08 acres	.04 acres	.01 acres	.01 acres
Other	--	--	--	--
Net Adjustment	--	-\$6,680	-\$4,290	-\$2,410
Adjusted Price	--	\$173,320	\$193,210	\$195,590

* Sold 1 is the most comparable sale to the subject.

¹ Comp's "Miles to Subject" was calculated by the system.

² Comp's "Miles to Subject" provided by Real Estate Professional.

³ Subject \$/ft based upon as-is sale price.

Reasons for Adjustments Why the comparable sale is superior or inferior to the subject.

Sold 1 used for age, style and GLA. this home is inferior in condition and GLA. adjustments: -5k for condition and -1680 for GLA at \$10/sf.

Sold 2 used for age, GLA and style. this home is superior in GLA. adjustments: -4920 for GLA at \$10/sf.

Sold 3 used for age, style and GLA. this home is superior in GLA. adjustments: -2410 for GLA at \$10/sf.

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct
Egg Harbor Township, NJ 08234

N/A
Loan Number

\$173,500
As-Is Value

Subject Sales & Listing History

Current Listing Status Not Currently Listed

Listing Agency/Firm

Listing Agent Name

Listing Agent Phone

of Removed Listings in Previous 12 Months 0

of Sales in Previous 12 Months 0

Listing History Comments

the subject last sold on 2/18/2006 for 185k

Original List Date	Original List Price	Final List Date	Final List Price	Result	Result Date	Result Price	Source
--------------------	---------------------	-----------------	------------------	--------	-------------	--------------	--------

Marketing Strategy

	As Is Price	Repaired Price
Suggested List Price	\$176,000	\$176,000
Sales Price	\$173,500	\$173,500
30 Day Price	\$169,000	--

Comments Regarding Pricing Strategy

Due to no homes selling in this neighborhood since 2013 and no active or pending comps at this time, comps were selected from the nearest comparable neighborhoods. Room totals were estimated off of GLA. I chose sold comp one as the base for my price. even though this home had the most amount of adjustments and was the first to close of all the comps, I feel that the amenities in the comparable neighborhood used are more enticing. They have a pool and tennis court. This also puts the subject in line with what is currently active and comparable.

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by ClearCapital

9 Brandywine Ct
Egg Harbor Township, NJ 08234

N/A
Loan Number

\$173,500
As-Is Value

Clear Capital Quality Assurance Comments Addendum

Reviewer's Notes The broker's as-is conclusion reflects the market for the subject. Comps are within a reasonable distance, relatively current, and accurately reflect the subject's defining characteristics. Thus, the as-is conclusion appears to be adequately supported.

DRIVE-BY BPO

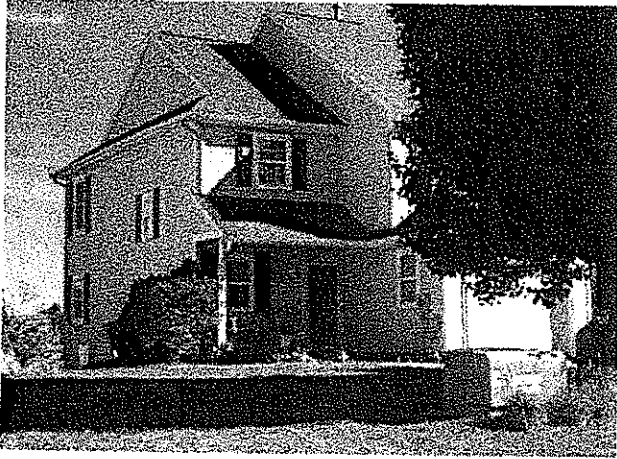
by ClearCapital

9 Brandywine Ct
Egg Harbor Township, NJ 08234

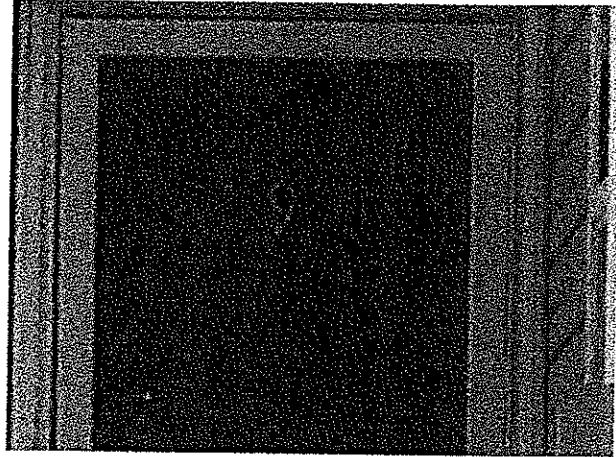
N/A
Loan Number

\$173,500
As-Is Value

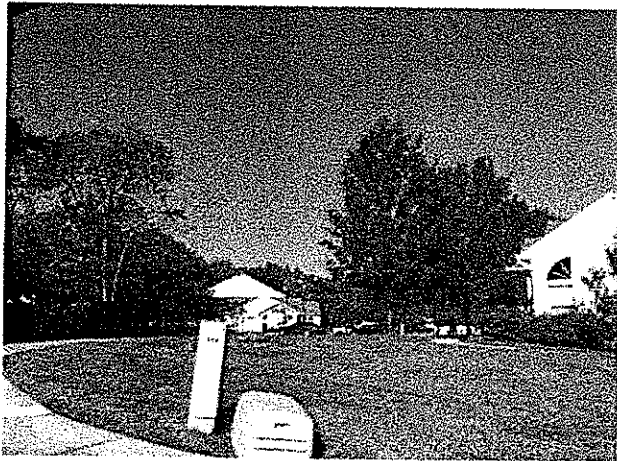
Subject Photos



Front



Address Verification



Street



Street

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by ClearCapital

9 Brandywine Ct
Egg Harbor Township, NJ 08234

N/A
Loan Number

\$173,500
As-Is Value

Listing Photos

34 Jamestown Circle
Mays Landing, NJ 08330



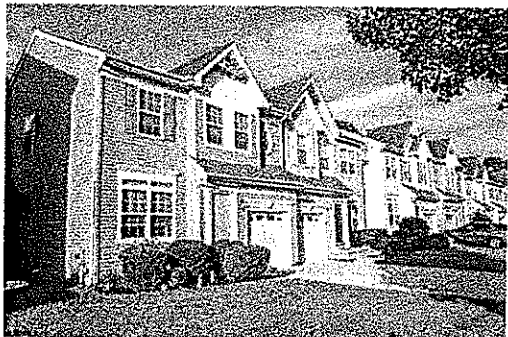
Front

143 Dunlin Lane
Pleasantville, NJ 08232



Front

215 Tyrens Drive
Mays Landing, NJ 08330



Front

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct
Egg Harbor Township, NJ 08234

N/A
Loan Number

\$173,500
As-Is Value

Sales Photos

S1 183 Tyrens
Mays Landing, NJ 08330



Front

S2 147 Tyrens Drive
Mays Landing, NJ 08330



Front

S3 4 Meadow Circle
Mays Landing, NJ 08330



Front

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct

Egg Harbor Township, NJ 08234

N/A

Loan Number

\$173,500

As-Is Value

ClearMaps Addendum

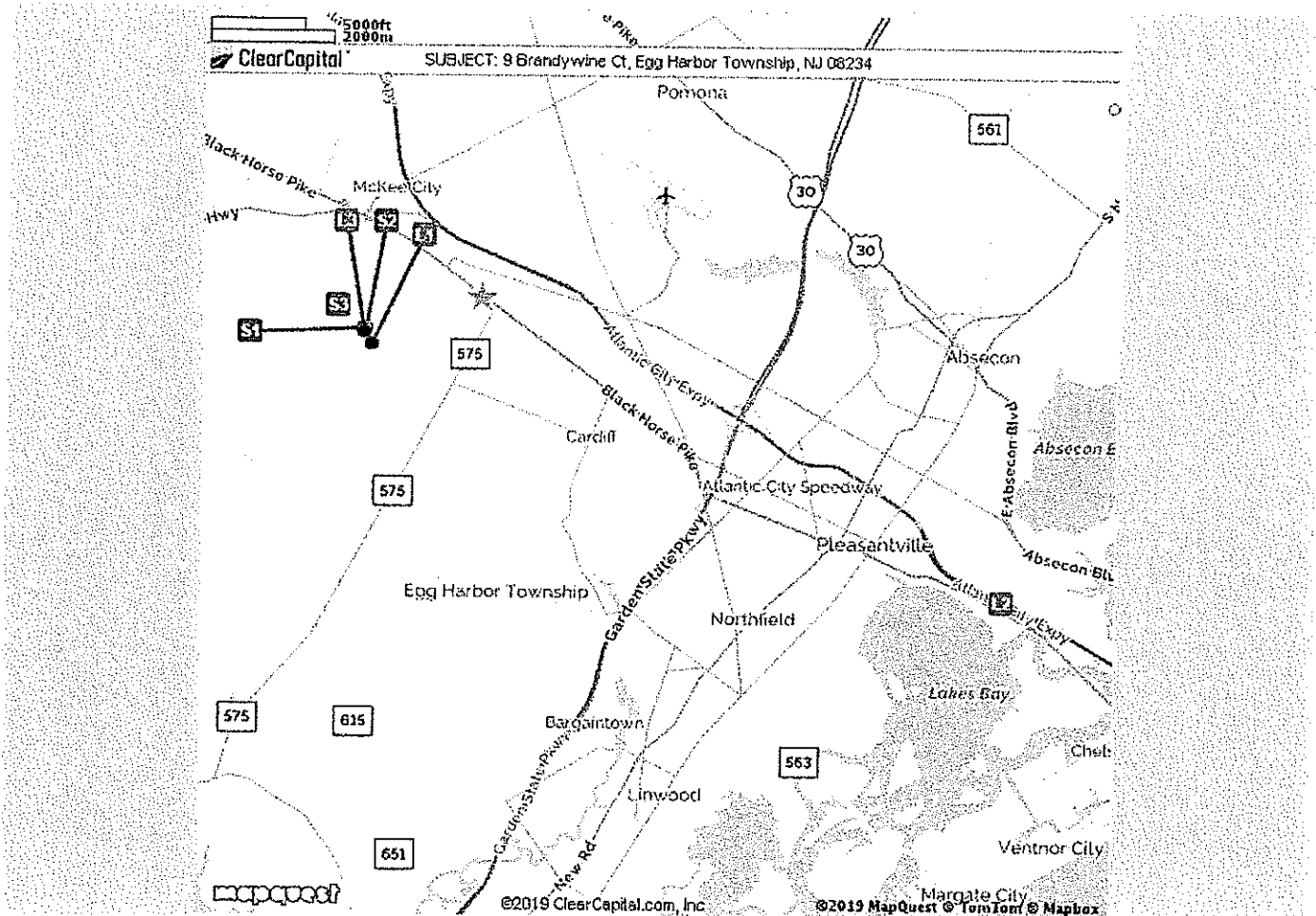
Address ☆ 9 Brandywine Court, Egg Harbor Township, NJ 08234

Loan Number N/A

Suggested List \$176,000

Suggested Repaired \$176,000

Sale \$173,500



Comparable	Address	Miles to Subject	Mapping Accuracy
☆ Subject	9 Brandywine Ct, Egg Harbor Township, NJ	--	Parcel Match
4 Listing 1	34 Jamestown Circle, Mays Landing, NJ	1.16 Miles ¹	Parcel Match
12 Listing 2	143 Dunlin Lane, Egg Harbor Township, NJ	7.36 Miles ¹	Parcel Match
25 Listing 3	215 Tyrens Drive, Mays Landing, NJ	1.21 Miles ¹	Parcel Match
51 Sold 1	183 Tyrens, Mays Landing, NJ	1.22 Miles ¹	Parcel Match
52 Sold 2	147 Tyrens Drive, Mays Landing, NJ	1.18 Miles ¹	Parcel Match
53 Sold 3	4 Meadow Circle, Mays Landing, NJ	1.66 Miles ¹	Parcel Match

¹ The Comparable "Distance from Subject" value has been calculated by the Clear Capital system.

² The Comparable "Distance from Subject" value has been provided by the Real Estate Professional.

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct

Egg Harbor Township, NJ 08234

N/A

Loan Number

\$173,500

As-Is Value

Satellite Map Addendum

Address ☆ 9 Brandywine Court, Egg Harbor Township, NJ 08234

Loan Number N/A

Suggested List \$176,000

Suggested Repaired \$176,000

Sale \$173,500



Comparable	Address	Miles to Subject	Mapping Accuracy
☆ Subject	9 Brandywine Ct, Egg Harbor Township, NJ	--	Parcel Match
🏠 Listing 1	34 Jamestown Circle, Mays Landing, NJ	1.16 Miles ¹	Parcel Match
🏠 Listing 2	143 Dunlin Lane, Egg Harbor Township, NJ	7.36 Miles ¹	Parcel Match
🏠 Listing 3	215 Tyrens Drive, Mays Landing, NJ	1.21 Miles ¹	Parcel Match
🏠 Sold 1	183 Tyrens, Mays Landing, NJ	1.22 Miles ¹	Parcel Match
🏠 Sold 2	147 Tyrens Drive, Mays Landing, NJ	1.18 Miles ¹	Parcel Match
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DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct

Egg Harbor Township, NJ 08234

N/A

Loan Number

\$173,500

As-Is Value

Addendum: Report Purpose

Market Approach and Market Time

The Market Approach of this report, as established by the customer, is: **Fair Market Price**. (See definition below.)

The Marketing Time as specified by the customer is **Typical**. (See definition below.)

Definitions:

Fair Market Price	A price at which the property would sell between a willing buyer and a willing seller neither being compelled by undue pressure and both having reasonable knowledge of relevant facts.
Distressed Price	A price at which the property would sell between a willing buyer and a seller acting under duress.
Marketing Time	The amount of time the property is exposed to a pool of prospective buyers before going into contract. The customer either specifies the number of days, requests a marketing time that is typical to the subject's market area and/or requests an abbreviated marketing time.
Typical for Local Market	The estimated time required to adequately expose the subject property to the market resulting in a contract of sale.

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct
Egg Harbor Township, NJ 08234

N/A
Loan Number

\$173,500
As-Is Value

Addendum: Report Purpose - cont.

Report Instructions

This section shows the instructions that were approved by the customer and provided to the broker prior to completing the report.
Instructions last updated: 7/17/2017

If this property is found to be vacant land, please STOP WORKING immediately and call Clear Capital at 530-582-5011

Please include the APN and Tax ID in the body of the report.

Purpose:

Please determine a market price for this property at which it would sell in a typical marketing time for the area.

Customer Specific:

Please provide the HOA and tax information in the body of the report.

- HOA address, Name, and any dues that are required.
- Tax assessed values, required tax amounts

Customer Special Request:

1. Please try to accurately determine occupancy to the best of your ability from a drive-by inspection.
2. Please provide detailed comments for each comparable stating how it is inferior or superior to the subject.

Comparable Requirements:

1. Please use market comps from the same neighborhood, block or subdivision whenever possible.
2. Please only use REO comparables if the market is driven by REOs and they are comparable in characteristics and condition.
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7. Please do not accept if you or your office has completed a report on this property in the last months, are currently listing this property, or have any vested interest in the subject property.
8. Clear Capital does

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct
Egg Harbor Township, NJ 08234

N/A
Loan Number

\$173,500
As-Is Value

Report Instructions - cont.

not allow any log ins from IP addresses from foreign countries. This includes, but is not limited to, data entry services, form completion services, etc. Also, it is against Clear Capital code of conduct to share your password with anyone who is not a W2 employee in your office.

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3. One ADDRESS VERIFICATION photo
4. One STREET SCENE photo looking down the street
5. Labeled MLS Sold & Listing Comp photos required; please comment if no MLS.

DRIVE-BY BPO

by ClearCapital

9 Brandywine Ct
Egg Harbor Township, NJ 08234

N/A \$173,500
Loan Number As-Is Value

Broker Information

Broker Name	Jill Falcone	Company/Brokerage	Berkshire Hathaway Home Services
License No	0564130	Address	620 Ashland Avenue Mays Landing NJ 08330
License Expiration	06/30/2021	License State	NJ
Phone	6092264707	Email	jill.falcone@foxroach.com
Broker Distance to Subject	4.87 miles	Date Signed	10/19/2019

By confirming the above contact and real estate license information and submitting the report, the above signed hereby certifies and agrees that: 1) I personally took the pictures, selected comparables, and determined the price conclusion. 2) To the best of my knowledge, the statements of fact contained in this report are true and correct. 3) The reported analyses, opinions, and conclusions are my personal, impartial, and unbiased professional analyses, opinions, and conclusions. 4) I have no present or prospective interest in the property that is the subject of this report and no personal interest with respect to the parties involved. 5) I have no bias with respect to the property that is the subject of this report or to the parties involved with this assignment. 6) My compensation for completing this assignment is not contingent upon the development or reporting of a predetermined price point. 7) I did not base, either partially or completely, my analysis and/or opinion and conclusions in this report on race, color, religion, sex, age, marital status, handicap, familial status, or national origin of either the prospective owners or occupants of the subject property or of the present owners or occupants of the properties in the vicinity of the subject property or on any other basis prohibited by law. 8) I maintain errors and omissions insurance, to the extent required by state law, for all liability associated with the preparation of this Report.

Disclaimer

This document is not an appraisal as defined by USPAP (Uniform Standards of Professional Appraisal Practice). It is not to be construed as an appraisal and may not be used as such for any purpose.

Unless otherwise specifically agreed to in writing:

The intended purpose of this report is to assist the Clear Capital account holder in making decisions within the scope of applicable statutory and regulatory requirements and performing required due diligence. This document is provided solely for the use of the Clear Capital account holder and not any other party, is not intended as any guarantee of value and/or condition of the subject property and should not be relied on as such. In the event that this document is found to be defective, incorrect, negligently prepared or unfit for its authorized use, Clear Capital's sole liability shall be to promptly refund the total fee expended by the account holder for this report or to replace it at no charge to the account holder, but in no event shall Clear Capital be responsible to the account holder for any indirect or consequential damages whatsoever. This warranty is in lieu of all other warranties, express or implied, except where otherwise required by law. The account holder shall notify Clear Capital within thirty (30) days of this report's delivery to the account holder if it believes that this document is defective, incorrect, negligently prepared or unfit for its authorized use. Under no circumstances may Clear Capital forms or their contents be published, copied, replicated, or mimicked.

EXHIBIT “C”

zillow.com/homes/9-brandywine-court-egg-harbor-township-nj/37791057_zpid/

Home | United States | NJ | US Code Title 17 | NJ Federal Rules of Evidence | Western New Jersey Division of Planning | create | log in | save | share | more

zillow

Edit Save Share More

-- bd -- ba 1,464 sqft

9 Brandywine Ct, Egg Harbor Township, NJ 08234

Off market Zestimate: \$187,970 Rent Zestimate: \$1,650/mo

Est. refi payment: \$1,108/mo Get current rates

Home value Owner tools Home details Neighborhood del

Home value

It looks like this property has missing facts, which can affect the accuracy of home value estimates.

Is this your home? Claim it and update home facts

Zestimate

\$187,970

LAST 30 DAY CHANGE

ZESTIMATE RANGE \$171,000 - \$211,000 +\$898 (+0.5%)

Map

3D

Street View

History

Compare

More

11:56 AM 6/17/2020

EXHIBIT “D”

Realtor.com

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Egg Harbor Twp, NJ New Jersey Atlantic County Egg Harbor Twp Brandywine Ct

Public View Owner's View

9 3 2.5 1,492 3,598

Map 9 beds 2.5 baths 1,492 sq ft 3,598 sq ft lot

Commute Time 9 Brandywine Ct, Egg Harbor Twp, NJ 08234

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Est. \$172,200

View up to 3 home estimates

Egg Harbor Twp

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11:37AM

6/18/2020

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31/9

What is Your Home Worth?

Request a FREE Analysis

By providing your contact to receive calls and texts at the number you provided, including analyzing by local data and provided and artificial neural net, we'll have information and 32001 about your equity and other home-related matters but not as a condition of any purchase.

EXHIBIT “E”

[illegible]

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c)	
DEMBO, BROWN & BURNS LLP Kyle F. Eingorn, Esquire 1300 Route 73, Suite 205 Mount Laurel, New Jersey 08054 Email: keingorn@dbblegal.com 856-354-8866	
In Re: SANDRA J. MAY	Case No.: <u>19-27812-JNP</u> Chapter: <u>13</u> Adv. No.: _____ Hearing Date: <u>July 1, 2020</u> Judge: <u>Jerrold N. Poslusny, U.S.B.J.</u>

CERTIFICATION OF SERVICE

1. I, Nicole A. Vogel:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary for Kyle F. Eingorn, Esquire, who represents the Creditor, McCormick 106, LLC in the above-captioned matter.

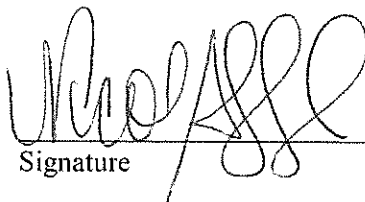
☐ am the _____ in the above case and am representing myself.

2. On 6/18/2020 I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

Objection of McCormick 106, LC to Confirmation of Debtors' Modified Chapter 13 Plan and Certificate of Service

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: 6/18/2020



Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Sandra J. May 9 Brandywine Court Egg Harbor Township, NJ 08234	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Eric Clayman, Esquire Jenkins & Clayman 412 White Horse Pike Audubon, NJ 08106	Debtor's counsel	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38, Suite 580 Cherry Hill, NJ 080002	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Kevin G. McDonald, Esquire KML Law Group, PC 216 Haddon Avenue, Suite 406 Westmont, NJ 08108 Counsel for PNC Bank	Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)